

THE HONORABLE MARSHA J. PECHMAN

U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

DONNA COPELAND, on behalf of herself and
all others similarly situated,

Plaintiff,

vs.

ALBION LABORATORIES, INC.; SEEKING
HEALTH, LLC; and DESIGNS FOR HEALTH,
INC.,

Defendants.

NO. 2:15-cv-00585-MJP

**STIPULATION AND [PROPOSED]
ORDER OF DISMISSAL PURSUANT
TO FEDERAL RULE OF CIVIL
PROCEDURE 41(a)(1)(A)(ii)**

**Note on Motion Calendar:
February 29, 2016**

I. STIPULATION

Plaintiff Donna Copeland and Defendants Seeking Health, LLC and Designs for Health, Inc. (collectively, the "Parties"), by and through their undersigned counsel of record, hereby stipulate as follows:

WHEREAS Fed. R. Civ. P. 41(a) permits the Parties to voluntarily dismiss an action without a court order by filing a stipulation of dismissal signed by all parties who have appeared;

WHEREAS this case has not been certified as a class action under Fed. R. Civ. P. 23;

WHEREAS the Parties have negotiated a settlement of Plaintiff's individual claims only;

THEREFORE the Parties agree and stipulate, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), that the above-captioned lawsuit shall be dismissed with prejudice as to Plaintiff's individual claims and without prejudice as to the potential claims of any absent putative class members.

IT IS SO STIPULATED.

RESPECTFULLY SUBMITTED AND DATED this 29th day of February, 2016.

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II. [PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of _____, 2016.

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Adrienne D. McEntee, hereby certify that on February 29, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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